

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

*Plaintiff,*

*v.*

ALEXIS D. NEGRÓN-CRUZ,

*Defendant.*

Case. No.: 11cr229-FAB

**MOTION TO EXTEND DEADLINE TO FILE NOTICE OF APPEAL RE:  
ORDER GRANTED JANUARY 21, 2025**

This motion asks the Court to extend the deadline to file any notice of appeal regarding ECF No. 561 by 30 days, to February 24, 2025.

**BASIS FOR THE REQUEST**

Generally, in “a criminal case, a defendant’s notice of appeal must be filed in the district court within 14 days after ... the entry of ... the order being appealed....” Fed. R. App. P. 4(b). Here, an order granting probation’s property forfeiture/destruction motion was issued on January 21, 2025. ECF No. 563. As such, any notice of appeal is due tomorrow, February 4, 2025.

The fourteen-day time limit, however, may be extended under Rule 4(b)(4), which provides: “Upon a finding of excusable neglect or good cause, the district court may—before or after the time has expired, with or without motion and notice—extend the time to file a notice of appeal for a period not to exceed 30 days from the expiration of the time otherwise prescribed by this Rule 4(b).” Fed. R. App. P. 4(b)(4).

Presently, good cause exists as set forth in ECF No. 564, which seeks an order authorizing the return of the property being held by probation. This Court has ordered a response from the government and probation by February 13, 2025, which is after tomorrow’s notice-of-appeal deadline. ECF No. 565. Notably, as mentioned in

ECF No. 564, a number of factor support return of Mr. Negrón's property: the parties' positions, the factual and procedural background of the case, and the applicable law on forfeiture. *See* ECF No. 564 at 3-5.

As such, in order to pursue a constructive, practical resolution of the present issue, we ask that the Court find good cause to extend the notice-of-appeal deadline regarding ECF No. 561 by 30 days, to February 24, 2025.

Since probation has agreed not to destroy anything pending resolution of the dispute, the requested extension will not prejudice anyone.

**WHEREFORE**, it is respectfully requested that the Court grant this motion.

**RESPECTFULLY SUBMITTED.** February 3, 2025

**RACHEL BRILL**  
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District of Puerto Rico

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**\*CERTIFICATION:** I ECF-filed this motion, notifying all parties of record.